

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff I2Z TECHNOLOGY, LLC (“I2Z”), for its complaint against Microsoft Corporation d/b/a Bing.com (“Microsoft”), Toeat.com LLC, Zillow, Inc. (“Zillow”), Google, Inc. (“Google”) (collectively, “Defendants”), demands a jury trial and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 271 *et seq.*, brought against Defendants for violations of those laws.

THE PARTIES

2. Plaintiff I2Z Technology, LLC is a Texas limited liability company with its principal place of business at 3301 W. Marshall Ave., Suite 302, Longview, TX 75604.

3. Upon information and belief, Defendant Microsoft is a Washington corporation with its principal place of business at 1 Microsoft Way, Redmond, Washington, 98052.

4. Upon information and belief, Defendant Toeat.com LLC is a Washington company with its principal place of business at 7231 Old County Road 54, New Port Richey, Florida, 34653-6106.

5. Upon information and belief, Defendant Zillow is a Washington corporation with its principal place of business at 1301 Second Avenue, Floor 31, Seattle, Washington 98101.

JURISDICTION AND VENUE

6. This action arises under the patent laws of the United States, Title 35 of the United States Code, §§ 1, *et seq.*

7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Upon information and belief, Microsoft has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Oregon, and within this District, and has engaged and continues to engage in sales and other conduct with respect to Microsoft's products and services within this District.

9. Upon information and belief, Toeat.com, LLC has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Oregon and within this District and has engaged and continues to engage in sales and other conduct with respect to Toeat.com LLC's products and services within this District.

10. Upon information and belief, Zillow has contacts that are sufficiently continuous and systematic to constitute doing business within the State of Oregon and within this District and has engaged and continues to engage in sales and other conduct with respect to Zillow's products and services within this District.

FACTUAL BACKGROUND

11. I2Z Technology, LLC is a software, internet services, web site development, and web site hosting company.

12. On September 6, 1994, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 5,345,551 (“the ‘551 patent”), entitled “Method and System for Synchronization of Simultaneous Displays of Related Data Sources.”

13. A true and correct copy of the ‘551 patent is attached as Exhibit A to this Complaint.

14. I2Z is the owner by assignment of all right, title, and interest in and to the ‘551 patent.

MICROSOFT

15. Microsoft is a software company providing software and web related products, including the website Bing.com.

16. Microsoft’s website, Bing.com, displays maps and driving directions at Bing.com/maps (“Bing Maps”).

17. Bing Maps displays two separate frames of data present on the screen, including a map demonstrating the highlighted driving route and driving directions.

18. Between these two separate frames on Bing Maps, there is a visible cause and effect.

19. Changes to the map made by dragging the highlighted route affect the driving directions.

20. The directions change as a response to the highlighted route.

21. The cause and effect is consistent so that when the changes to the highlighted route are removed, the directions return to their original form.

TOEAT.COM

22. TOEAT.COM LLC (“TOEAT”) provides restaurant location information on its website www.toeat.com (the TOEAT website).

23. The TOEAT website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular restaurants and detailed listings including location information.

24. Between these two separate frames on the TOEAT website, there is a visible cause and effect.

25. Changes to the map made by zooming in or out affect the listings.

26. The listings change as a response to the changes made to the map by zooming in or out.

27. The cause and effect is consistent so that when the changes made to the map are removed the listings return to their original form.

ZILLOW

28. ZILLOW, Inc. has a website offering real estate location maps and listing information at www.zillow.com (“the Zillow website”).

29. The Zillow website displays maps and detailed property information.

30. The Zillow website displays two separate frames of data present on the screen, including a map demonstrating the locations of particular real estate listings and real estate listing information.

31. Between these two separate frames on the Zillow website, there is a visible cause and effect.

32. Changes to the map made by zooming in or out or scrolling so that a different area is covered affect the real estate listings.

33. The real estate listings change as a response to the changes made to the map by zooming in or out or scrolling so that a different area is covered.

34. The cause and effect is consistent so that when the changes made to the map are removed the listings return to their original form.

COUNT 1
INFRINGEMENT OF U.S. PATENT NO. 5,345,551

(ALL DEFENDANTS)

35. I2Z realleges and incorporates herein by reference the allegations contained in Paragraphs 1 through 34.

36. Without license or authorization, the Defendants have been, and/or continue to be, literally or equivalently infringing the '551 patent, directly and/or indirectly, by making, using, marketing, selling, offering to sell, licensing and/or supporting systems, websites, products and/or services covered by one or more claims of the '551 patent.

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

37. I2Z has been damaged by the Defendants' infringements, and will continue to suffer damage and irreparable injury until all infringements are enjoined by this Court.

38. I2Z is entitled to injunctive relief and damages in accordance with 35 U.S.C. §§ 271, 281, 283, 284, and 287.

JURY DEMAND

39. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, I2Z hereby respectfully requests a jury trial on all issues and claims so triable.

PRAYER FOR RELIEF

WHEREFORE, I2Z prays for judgment as follows:

A. That the Defendants have infringed, contributorily infringed and/or actively induced others to infringe the '551 patent.

B. That, in accordance with 35 U.S.C. § 283, the Defendants, and all affiliates, employees, agents, officers, directors, attorneys, successors and assigned, and all those acting on behalf of or in active concert or participation with any of them, be enjoined from infringing, contributorily infringing and/or inducing others to infringe the '551 patent.

C. That I2Z be awarded damages sufficient to compensate it for the Defendants' infringement of the '551 patent.

D. That I2Z be awarded pre-judgment and post-judgment interest; and
PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

E. That I2Z be awarded such other and further relief as this Court deems just and proper.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'L' followed by a horizontal line extending to the right.

Lloyd L. Pollard, II, OSB 07490

Dated: September 14, 2011

Ganz Law, PC
163 SE 2nd Avenue
Hillsboro, Oregon 97123
(503) 844-9009
mail@ganzlaw.com

*Attorneys for Plaintiff
I2Z TECHNOLOGY, LLC*